

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

ROBERT DAVID STEELE	)	
-and-	)	
EARTH INTELLIGENCE NETWORK	)	
Plaintiffs,	)	
v.	)	<u>Case No. 3:17-cv-601-MHL</u>
JASON GOODMAN	)	DEFENDANT DEMANDS
PATRICIA A. NEGRON	)	DISMISSAL WITH PREJUDICE
-and-	)	
SUSAN A. LUTZKE a/k/aQUEEN TUT"	)	
Defendants.	)	
	)	

**ANSWER**

Plaintiffs, Robert David Steele and Earth Intelligence Network, by counsel, have filed a frivolous Complaint with no evidentiary value against Defendant, Jason Goodman (“Goodman”). As detailed in the Special Motion to Dismiss, Plaintiff has brought an amended complaint and the collective action is believed by Goodman to be a Strategic Lawsuit Against Public Participation. The action represents an effort to suppress journalistic reporting of prima facie evidence that shows felony charity fraud by Plaintiffs, Robert David Steele and Earth Intelligence Network.

It is Goodman’s belief Plaintiff has deliberately caused defects in the original complaint and conspired with Codefendants to bring about the amended complaint in Plaintiff’s ongoing effort to burden Goodman with frivolous and punitive civil action.

Plaintiff seeks (a) compensatory damages, statutory damages (three-fold the damages sustained), and punitive damages in an amount not less than \$18,350,000.00, however this amount is arbitrary and not reflective of the value of Plaintiff’s current or past business operations or annual earnings as reported in 990 forms submitted to the IRS.

**I. PARTIES**

1. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.

2. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

3. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

4. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

5. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

6. DENY

7. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation elsewhere

8. Defendant, Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

9. Defendant, Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

**II. JURISDICTION AND VENUE**

10. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

11. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

12. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.

13.

**Case 3:17-cv-00601-MHL Defendant's Answer Page 3 of 8**

**III. STATEMENT OF THE FACTS**

14. DENY

15. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation .

16. DENY

17. Defendant lacks knowledge or information sufficient to form a belief about the truth of this

18. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

19. DENY

**A. False and Defamatory Statements Prior to September 1, 2017**

20. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

21. DENY

**B. False and Defamatory Statements Since September 1, 2017**

22. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

23. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

24. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

25. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

26. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

27. ADMIT

**Case 3:17-cv-00601-MHL Defendant's Answer Page 4 of 8**

28. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

**C. False and Defamatory Statements Since December 25, 2017**

29. DENY

30. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

31. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation\

32. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

**COUNT I – DEFAMATION PER SE**

33. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

34. DENY

35. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

36. DENY

37. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

38. DENY

39. DENY

40. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

**COUNT II – INSULTING WORDS**

41. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

42. DENY

43. DENY

44. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

**COUNT III – BUSINESS CONSPIRACY**

45. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

46. DENY

47. DENY

48. DENY

49. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

50. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

**COUNT IV – COMMON LAW CONSPIRACY**

51. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.

52. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.

53. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

**COUNT V – TORTIOUS INTERFERENCE**

54. Defendant lacks knowledge or information sufficient to form a belief about the

**Case 3:17-cv-00601-MHL Defendant's Answer Page 6 of 8**

truth of this allegation

55. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

56. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

57. DENY

58. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

**COUNT VI – INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS**

59. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

60. DENY

61. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

62. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

63. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

64. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

**COUNT VII – PERSONAL TRESPASS AND COMPUTER HARASSMENT**

65. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

66. DENY

67. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.

68. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

69. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

**COUNT VIII – UNAUTHORIZED USE OF NAME AND PICTURE (§ 8.01-40)**

70. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

71. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

72. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

73. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

**COUNT IX – PERMANENT INJUNCTION**

74. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

75. DENY

76. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

77. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

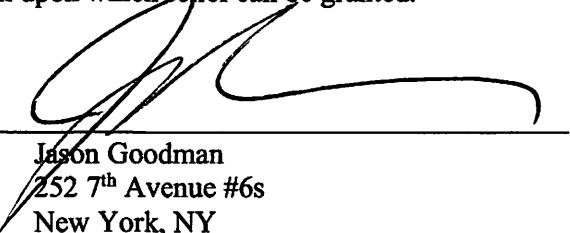
78. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation

the right to amend this Complaint upon discovery of additional instances of the Defendants' defamation and wrongdoing.

Case 3:17-cv-00601-MHL Defendant's Answer Page 8 of 8

CONCLUSION

The plaintiff has failed to state a claim upon which relief can be granted.

By: 

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